

**Rochester Free Radio, Inc.**  
**Application for Modification of Construction Permit**  
**Facility ID 192286 – WRFZ-LP -- Rochester, NY**  
**Exhibit 11A -- Request for "Second-Adjacent" Waiver**

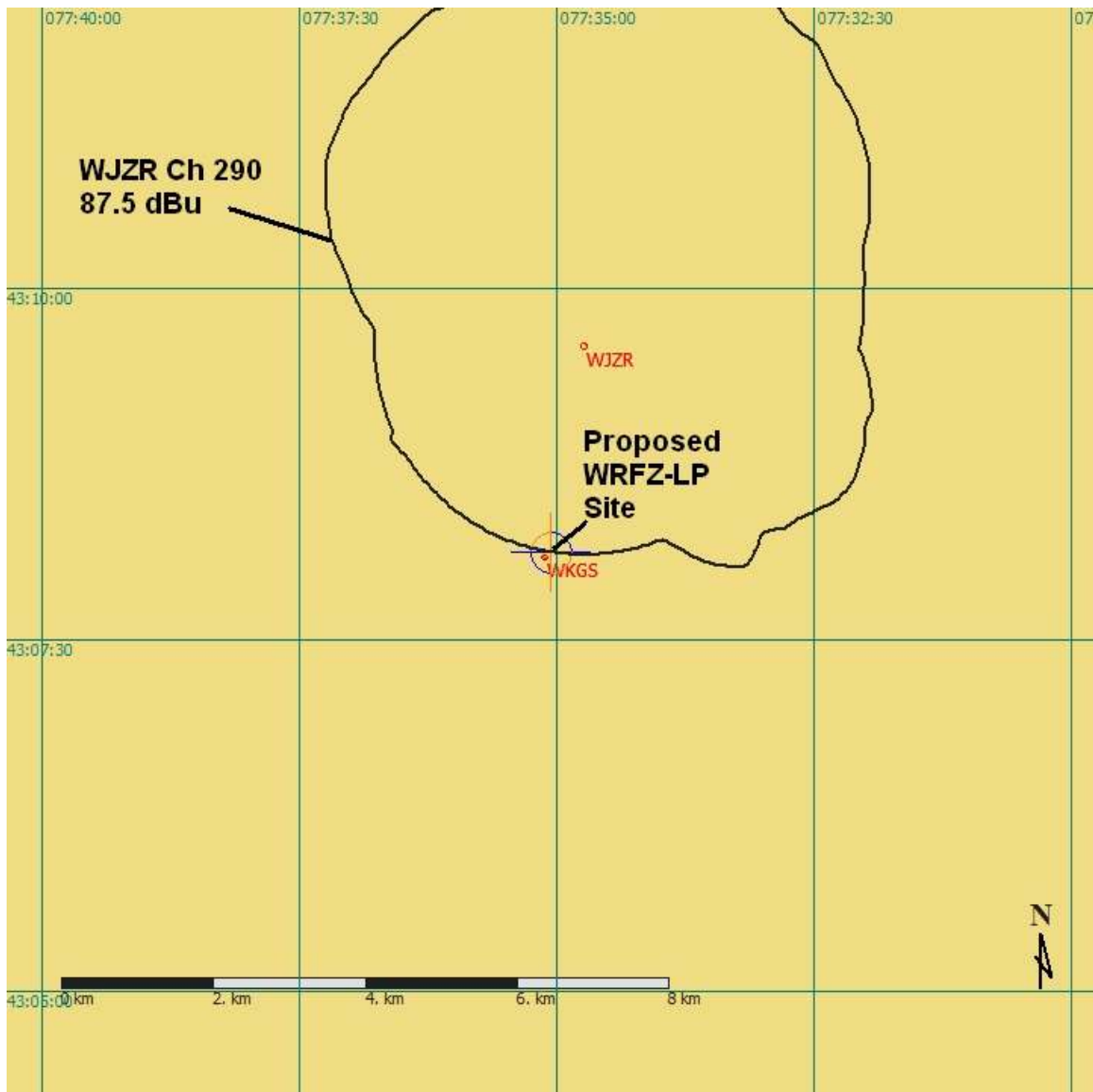
The proposed antenna site of WRFZ-LP exceeds the 47 CFR §73.807(a) minimum distance separations from all FM facilities except second-adjacent stations WJZR, Channel 290A, Rochester, NY and WKGS, Channel 294A, Irondequoit, NY.

*Under an exception provided in 47CFR §73.807(e)(1), "The Commission will entertain requests to waive the second-adjacent channel separations in paragraphs (a) through (c) of this section on a case-by-case basis. In each case, the LPFM station must establish, using methods of predicting interference taking into account all relevant factors, including terrain-sensitive propagation models, that its proposed operations will not result in interference to any authorized radio service. The LPFM station may do so by demonstrating that no actual interference will occur due to intervening terrain or lack of population. The LPFM station may use an undesired/desired signal strength ratio methodology to define areas of potential interference."*

A "second-adjacent" waiver is respectfully requested in the instant LPFM application, based on this showing that any predicted interference to WJZR and WKGS would be confined to an unpopulated area.

The proposed LPFM antenna will be side-mounted at 27 meters above ground level on an existing self-supporting tower having Antenna Structure Registration Number 1003958. It is located at the Pinnacle Hill "antenna farm" and there are no occupied structures within a 90 meter radius, as shown in Exhibit 11C.

The proposed site is 2.75 kilometers south of WJZR and 0.11 kilometers northeast of WKGS. WJZR has a predicted F(50,50) field strength of 87.5 dBu at the proposed WRFZ-LP site, as shown in Figure 1, while WKGS (on an adjacent tower at Pinnacle Hill) has a "free-space" field strength of 133.5 dBu at the proposed site.



Based on the accepted undesired-to-desired signal ratio of 40 dB that defines second-adjacent interference, no interference to WJZR or WKGS would be expected beyond the 127.5 dBu free-space contour of the proposed WRFZ-LP facility. At 13 watts ERP, the radius of this contour is 11 meters in the horizontal plane. As the proposed radiation center is 27 meters above ground level, it is clear that this interference contour would not reach a populated area.

Based on this showing, Rochester Free Radio, Inc. believes the proposed modification to WRFZ-LP would not cause second-adjacent interference to WJZR or WKGS.